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A. V. MORISI
MANAGER
NUCLEAR OPERATIONS SUPPORT DEPARTMENT

BECO. Ltr. #81-67

March 30, 1981



Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch #3
Division of Operating Reactors
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

License No. DPR-35
Docket No. 50-293

Dear Mr. Ippolito:

In your letter dated February 3, 1981, you transmitted your comments and proposed modifications to the Pilgrim Station Breakwater Continuous Monitoring Program, which we submitted to you on December 5, 1980 (BECO. Ltr. #80-311). Your proposed changes and our revisions to them were discussed and resolved by Mr. M. Williams of your staff and Mr. J. Fulton of our Licensing Group during a telephone conference on March 19, 1981.

We have revised the PNPS Breakwater Monitoring Program to reflect the agreed upon changes, and resubmit it as Attachment "A" to this letter. We are confident that this resolution is acceptable to you and therefore have initiated the Pilgrim Station Breakwater continuous Monitoring Program per the described schedule.

Thank you for your assistance in resolving this issue.

Very truly yours,

W. H. Deacon for
A. V. Morisi

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Attachment A

Breakwater Continuous Monitoring Program Description

Photographs will be taken of points along the breakwater from permanently established benchmarks on the shoreline. These photographs will affirm the position of each visible lee side stone.

On an annual basis, after the winter storm season (on or closely following April 1), a complete set of photographs will be taken from the existing photo points on the shoreline. These photographs will be compared to the originals to detect any major damage or movement.

In addition, aerial photographs will be taken at the same scale as the ones that were included in BECo's April 10, 1980 response to the NRC's questions concerning the breakwater. A comparison similar to that described above will be performed with these.

Upon identification of any damage to the breakwater, the NRC Project Manager and/or the Chief of the Hydrologic and Geotechnical Engineering Branch will be notified and repairs will be implemented as soon as possible. These repairs will be conducted under the surveillance of BECo's Quality Assurance Department. The NRC Project Manager and/or the Chief of the Hydrologic and Geotechnical Engineering Branch will be notified upon completion of repairs.

These same procedures will be undertaken as soon as possible following a storm or a hurricane when onshore winds are in excess of 50 mph for 2 hours as measured at the site. The Environmental and Radiological Health and Safety Group shall monitor storm severities and notify the Nuclear Engineering Civil Structural Group, when the storm criteria has been met and a survey required.

The NRC Project Manager and/or the Chief of the Hydrologic and Geotechnical Engineering Branch will be notified as soon as possible when a survey has been initiated.

The documented findings of all surveys conducted during the previous year will be submitted to the NRC annually.